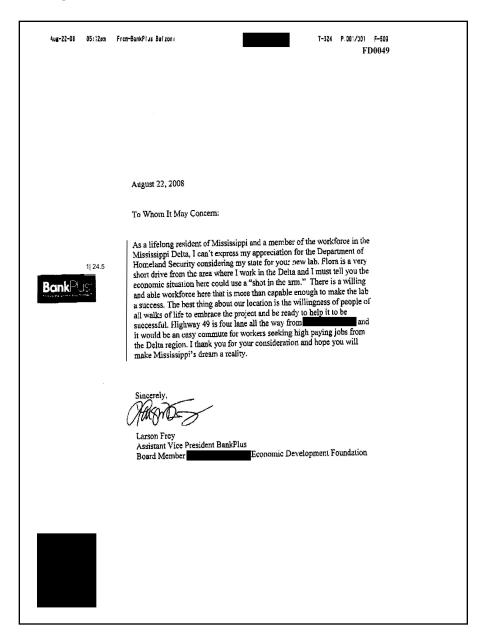
## Frey, Larson

## Page 1 of 1



Comment No: 1 Issue Code: 24.5 DHS notes the commentor's support for the Flora Industrial Park Site Alternative.

**2-1040**December 2008

## Frierson, Ann

## Page 1 of 1

		WD0234	
	From:	on behalf of Ann Frierson	
	Sent: To:	Tuesday, August 12, 2008 12:09 PM NBAFProgramManager	
		: NBAF in Athens, Georgia	
1 25.2	I will not l	list my reasons for hoping that you will choose a location other than Athens, GA for NBAF because you arty-line rebuttal to anything I might say. I do, however, ask that you locate the facility where the as well as the politicians and vested interests, welcome it.	
	Ann Frierso	on.	

Comment No: 1 Issue Code: 25.2 DHS notes the commentor's opposition to the South Milledge Avenue Site Alternative.

**2-1041** December 2008

## Fryer, Thomas

## Page 1 of 1

PD0110

August 19, 2008

My name is Tom Fryer. I'm calling from Kansas. I'm a retiree and I'm calling in support of the bid by Kansas State University in Manhattan, Kansas to host the NBAF. I think the community involvement, the community support, is very strong here and that's contrasting with some of the other sites.

I think what really distinguishes Manhattan is the fact that the Pat Roberts, a Level-3 facility will sit right next to the NBAF facility, and there'll be a lot of synergy involved with that. I think that's one of the strengths. I also believe the bio agro corridor that exists between Manhattan, Kansas through Kansas City all the way to Columbia, Missouri....there's just a number of companies and scientists that are involved in this, and if this facility is put here in Manhattan, Kansas, they'll be able to...there'll be a synergy effect. There'll be a networking effect that would perhaps not be involved with any of the other sites.

So, again, I think the public support is very positive here. It will be a great addition. I think the quality of life of this area will be an enhancement to those involved with the facility as well. So, I'd strongly encourage you to place that facility here in Manhattan, Kansas - the little apple, and just really a gem.

My final comment - I'm a retiree from the United States Air Force. I decided to retire in because of that quality of life. And with the University here, it is a great attraction, and I think it will, I think, significantly enhance the fact that NBAF is here.

So thank you for listening and I appreciate it very much. And I hope the announcement will be positive for Manhattan, Kansas.

Thank you very much.

Bye, bye.

Comment No: 1 Issue Code: 24.4

DHS notes the commentor's support for the Manhattan Campus Site Alternative.

**2-1042** December 2008

## Fryer, Thomas

#### Page 1 of 2

WD0562 From: Tom Fryer Sent: Sunday, August 24, 2008 6:06 PM NBAFProgramManager Subject: Support for NBAF coming to Manhattan, KS DHS Undersecetary Jay Cohen: The purpose of this email is to strongly support your selection of 1 24.4 Manhattan, KS, as the future site for NBAF. I believe I speak for the silent majority of the residents of Manhattan who also strongly support this decision. I personally know several of the members of a recent group who oppose NBAF, but most are the same ones who oppose most public projects in this area. No other site offers the Collaborative Opportunities that exist here in Manhattan. The fact that the Biological Research Institute will be right next door is a huge factor. That site could have gone somewhere 2| 8.4 else, but the advantages of Manhattan and Kansas State University were very evident - the same applies to NBAF. Some recent media coverage has suggested that in the area of Acquisition, Construction, and Operations Impacts some of your data was flawed. If in fact you used Kansas City construction costs, you 3| 23.0 need to recalculate, as our construction costs are lower. It seems this is a major factor in your formula and I firmly believe we either match or exceed San Antonio and Flora in this category. In the interest of brevity and your time, I will not elaborate on all the other Quality of Life issues that make Manhattan a great place to live. I will close with the reason my family and I decided to settle permanently in in the early 1980s. I was a pilot and career officer in the US Air Force and my last assignment was with the Air Force ROTC detachment at of living in to realize this was the city where we wanted to raise our children and settle permanently. Your NBAF employees will be very pleased as well. 1 cont. 24.4 You will never regret your selection of Manhattan as the site for NBAF. Thomas A. Fryer, Lt Col (Ret)

Comment No: 1 Issue Code: 24.4

DHS notes the commentor's support for the Manhattan Campus Site Alternative.

Comment No: 2 Issue Code: 8.4 DHS notes the commentor's statement.

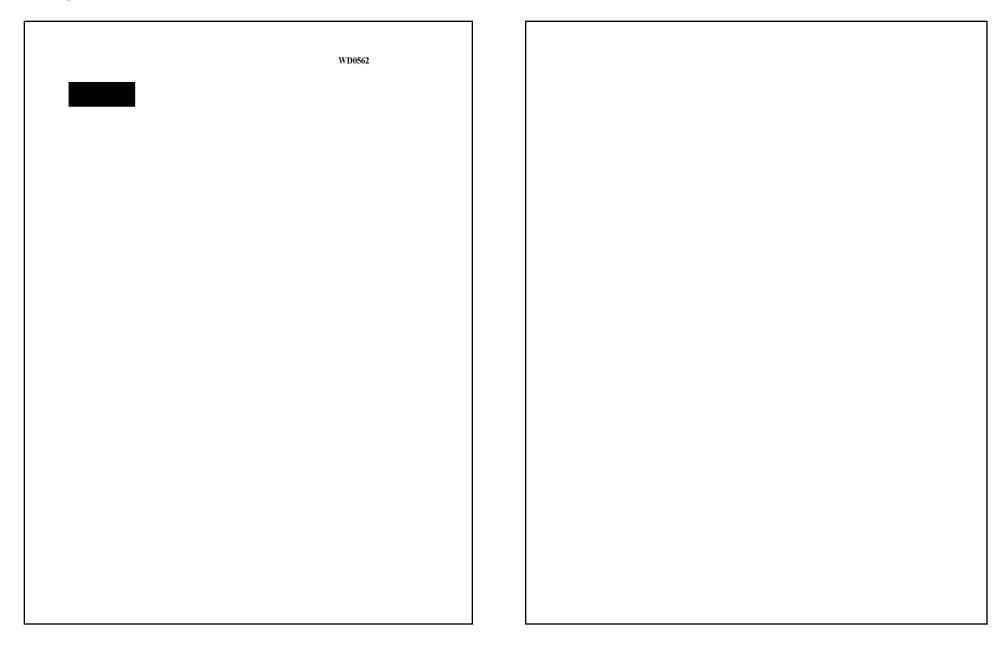
Comment No: 3 Issue Code: 23.0

DHS notes the commentor's supposition that the construction cost in Kansas are lower that reported in the NBAF EIS. DHS will document, review and incorporate all appropriate new and/or revised information prior to making a decision.

**2-1043** December 2008

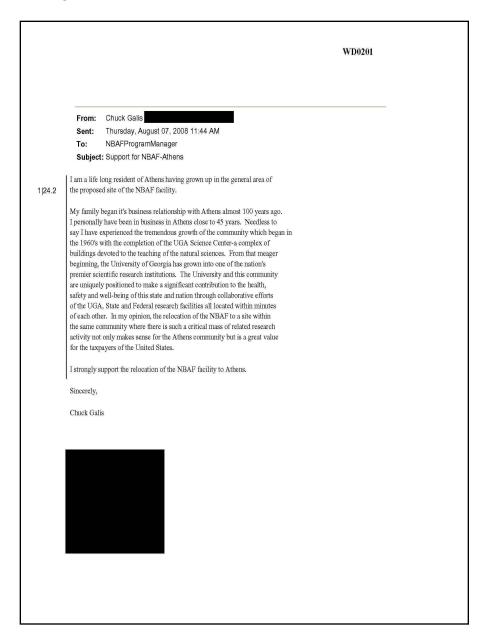
Fryer, Thomas

Page 2 of 2



## Galis, Chuck

## Page 1 of 1



Comment No: 1 Issue Code: 24.2 DHS notes the commentor's support for the South Milledge Avenue Site Alternative.

2-1045 December 2008

#### Gallagher, Joseph

#### Page 1 of 2

WD0039

From: Joseph T. Gallagher

Sent: Friday, July 04, 2008 5:05 PM
To: NBAFProgramManager

Cc:

Subject: DHS Proposal to Relocate Plum Island Facility

1/24.1; As a healthcare infection control specialist, I am dumbfounded by the idiocy of proposing to move the virus research facility from the safely isolated location of Plum Island, New York to any other location on the mainland of CONUS. The risks for overwhelming catastrophe are almost unimaginable.

3|27.0 | The Department of Homeland Security should recuse themselves from any association with this government function which would, should, be more appropriately returned to the Department of Agriculture.

It appears the Department of Homeland Security and the Bush Administration have learned nothing from the climatic unpredictability of weather as demonstrated by the devastating results of Hurricane Katrina, the California firestorms, and the current flooding in the midwest. I can not even begin to speculate as to the level of impracticality and illogical thinking that led to the determination that the five preferred locations for resiting this laboratory are Athens, GA, Manhattan, KS, Butner, NC, San Antonio, TX and Flora, MI. That the Bush Administration would even think that relocating this facility to any of the above locations, much less to Texas or Kansas, which states maintain considerable livestock herds that could be decimated if the hoof-in-mouth virus lwas to escape into the region, is sheer madness.

1 cont.| The fact that rebuilding at the current Plum Island location is considered the sixth and last option, and, in my opinion, the only option, is regrettable. This should be the first, and only, option to be considered.

The assertion in the 1,005-page Homeland Security Department study stating that chances of an outbreak would be "extremely low" if (note the "if") the research lab were designed, constructed, and operated according to government safety standards is absolutely laughable and sadly piting.

Our government safety standards in construction, in workplace safety, in healthcare facilities, schools, business and industry are constantly being overlooked in the interests of expediency and costs. Construction crane accidents, mine accidents, government buildings not even constructed up to local municipal codes, much less government safety standards, make the relocation of the Plum Island facility to a newly constructed building a fool's bet.

We have seen, due to flooding, typhoon, hurricanes, drought, and mismanagement a highly significant decline this year in the production of agricultural food sources.

4 cont.| 5.0 Why in God's name would we move a highly volatile number of virus' from an isolated location where a systems error could be contained, to a mainiand location where we disregard the potential forces of nature and failing human nature? Are we not satisfied with the implications of the loss of rice, corn, soy, and wheat crops that will not be planted nor harvested this year that we must also ensure we endanger our herds of cattle, swine, lambs and sheep? We evidently cannot see the forest for the trees and obviousness defaults to obliviousness once again

A safer bet than relocating Plum Island research activities to the mainlain would be to take our entire government financial resources and play a "hunch" bet at the Las Vegas gaming tables.

Is there no common sense amongst our leaders and elected officials? I pray that where our alleged experts appear intent on falling their commitment to safeguard the population and its food sources, our citizenry will step in to avert disaster.

Thank you,

Comment No: 1 Issue Code: 24.1

DHS notes the commentor's support for the Plum Island Site Alternative.

Comment No: 2 Issue Code: 25.0

DHS notes the commentor's opposition to the five mainland site alternatives.

Comment No: 3 Issue Code: 27.0

DHS has the responsibility for siting, building and operating the NBAF. However, USDA will be the main tenant and is responsible for conducting research according to its current mission. These responsibilities are further described in Chapter 1, Section 1.2.2 of the NBAF EIS.

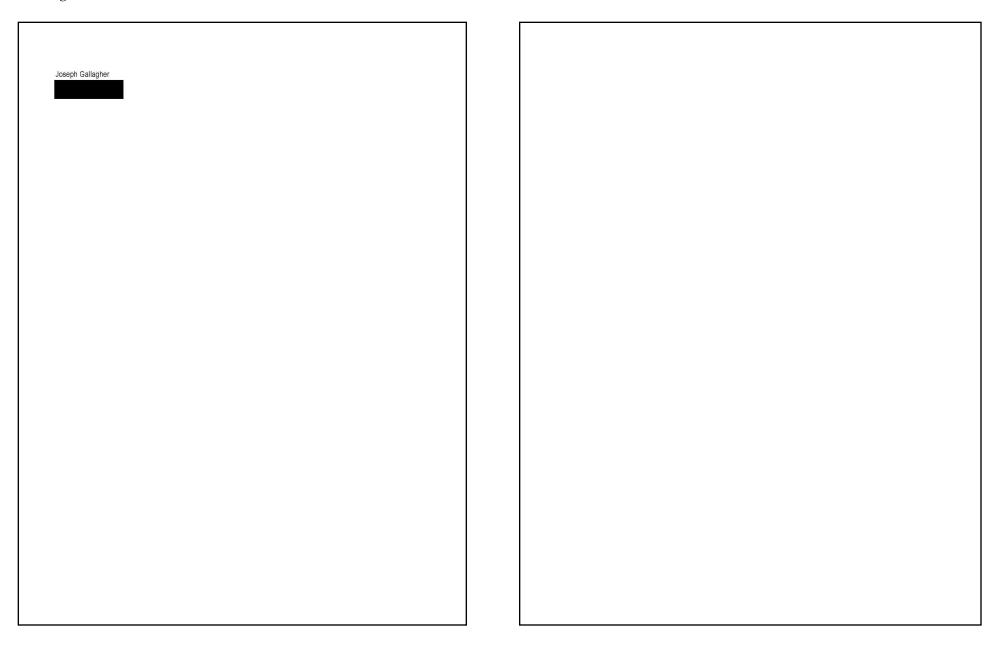
Comment No: 4 Issue Code: 5.0

DHS notes the commentor's opinions regarding the selection of reasonable alternatives for analysis in the NBAF EIS. Accidents could occur in the form of procedural violations (operational accidents), natural phenomena accidents, external events, and intentional acts. Although some accidents are more likely to occur than others (e.g., safety protocol not being followed), the chances of an accidental release are low. The specific objective of the hazard identification, accident analysis, and risk assessment is to identify the likelihood and consequences from accidents or intentional subversive acts. In addition to identifying the potential for or likelihood of the scenarios leading to adverse consequences, this analysis provides support for the identification of specific engineering and administrative controls to either prevent a pathogen release or mitigate the consequences of such a release. The risk of an accidental release of a pathogen is extremely low. The risk of an accidental release of a pathogen is extremely low, but the economic effect would be significant for all sites. As described in Section 3.10.9 of the NBAF EIS, the economic impact of an outbreak of foot and mouth disease virus has been previously studied and could result in a loss in the range of \$2.8 billion in the Plum Island region to \$4.2 billion in the Manhattan, Kansas area over an extended period of time. The economic loss is mainly due to potential foreign bans on U.S. livestock products. Although the effects of an outbreak of Rift Valley fever virus on the national economy has not been as extensively studied, the potential economic loss due to foreign bans on livestock could be similar to that of foot and mouth disease outbreak, while the additional cost due to its effect on the human population could be as high as \$50 billion. There is little economic data regarding the accidental or deliberate Nipah virus release. However, cost would be expected to be much lower then a release of foot and mouth disease virus or Rift Valley fever virus as the Nipah virus vector is not present in the western hemisphere.

**2-1046** December 2008

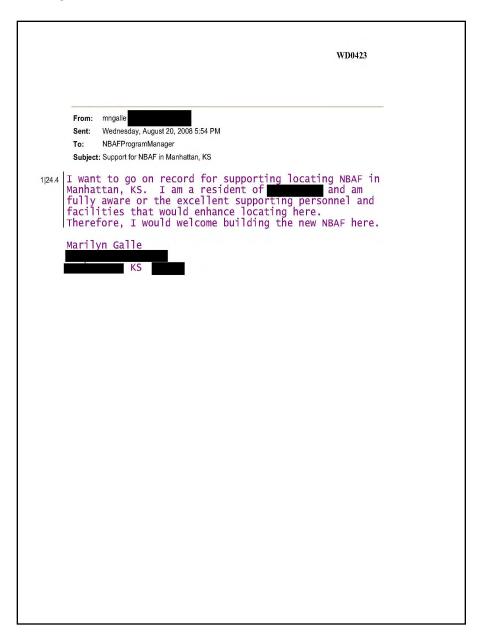
## Gallagher, Joseph

Page 2 of 2



## Galle, Marilyn

## Page 1 of 1



Comment No: 1 Issue Code: 24.4 DHS notes the commentor's support for the Manhattan Campus Site Alternative.

**2-1048**December 2008

#### Galle, Nelson

#### Page 1 of 2

WD0380 From: Nelson Galle Sent: Tuesday, August 19, 2008 7:12 PM NBAFProgramManager Subject: Build NBAF in Kansas To: DHS Science and Technology Directorate James Johnson From: Nelson D. Galle. 1|24.4 This is to inform you that I fully support the location of NBAF at Manhattan, Kansas. I have spent my entire career in Agribusiness, mostly in Kansas. I have also lived and worked for agribusiness companies in Europe especially in France and Italy. My two degrees are from Kansas State University. Immediately after college I was a veterinary inspector in the United States Air Force. Keeping the food supply on Air Force bases safe was my job. My agribusiness experience included a partnership for 15 years in a Swine multiple farrowing operation, another 22 years as a Vice President of a \$300 million Agricultural Machinery manufacturing company and 10 years as owner/manager of the only Turkey Hatchery in the states of Kansas and Nebraska (producing over 4 million turkey poults per year). From 1958 to the present I have also owned and operated a crop production operation in south central Kansas. With this experience I fully understand the importance of food safety and bio-security from a producers point of view. That is why you and the DHS should make the decision to locate this new NBAF in Manhattan. When producers need help from the diagnostic lab and research scientists the turn around time is critical. Locating it in the central part if the United States near where the food is produced in this country reduces, not increases, the risk of a serious disease destroying our food plants and animals. Last summer during wheat harvest in Kansas (and wheat sales and exports are a huge industry in Kansas) there was a problem with shipping and exporting new crop wheat because of a herbicide used to treat a fungus on the wheat plant. Less than 24 hours after the problem was identified the research labs and scientists at Kansas State University had recieved and diagnosed wheat samples as negative for the herbicide and released the hold on shipping. This is one example of how important a rapid response is from the lab to the field and the field to the lab. For these reasons building the new NBAF near the center of food production in the 1 cont. 24.4

Comment No: 1 Issue Code: 24.4

DHS notes the commentor's support for the Manhattan Campus Site Alternative.

Comment No: 2 Issue Code: 21.4

DHS notes the commentor's support for the Manhattan Campus Site Alternative. The decision on whether or not the NBAF is built, and, if so, where will be made based on the following factors: 1) analyses from the EIS; 2) the four evaluation criteria discussed in Section 2.3.1; 3) applicable federal, state, and local laws and regulatory requirements; 4) consultation requirements among the federal, state, and local agencies, as well as federally recognized American Indian Nations; 5) policy considerations; and 6) public comment.

**2-1049** December 2008

## Galle, Nelson

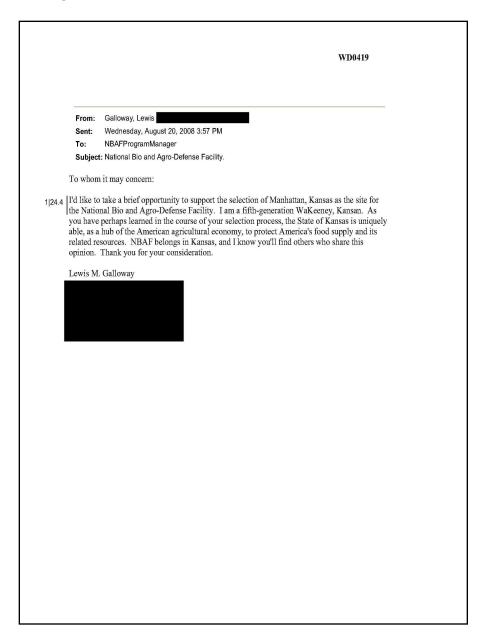
## Page 2 of 2

# WD0380 United States and near the concentration of food safety research scientists is, in my opinion, the only correct decision for DHS. 1 cont. Manhattan, Kansas does not, in my opinion, need this NBAF for economic development but rather the American people need this new facility in Manhattan, very close to where the food is produced, so we in this country can continue to have the safest, most reliable food supply in the world. If we build it anywhere else for any other reasons I believe it will be a big mistake. A mistake our country cannot afford to make now or in the future. Thank you for recieving these comments. Nelson D. Galle

2-1050

## Galloway, Lewis

## Page 1 of 1



Comment No: 1 Issue Code: 24.4 DHS notes the commentor's support for the Manhattan Campus Site Alternative.

**2-1051** December 2008

## Garibay, Bernie

## Page 1 of 1

PD0326 August 25, 2008 Yes. Kansas. I would like to show my opposition to This is Bernie Garibay in Kansas. locating that laboratory in Manhattan, Kansas. 1| 25.4 I think it needs to be in an isolated location similar to the Plum Island. 2| 5.0 Thank you.

Comment No: 1 Issue Code: 25.4

DHS notes the commentor's opposition to the Manhattan Campus Site Alternative.

Comment No: 2 Issue Code: 5.0

DHS notes the commentor's opposition to the five mainland site alternatives in favor of the Plum Island Site Alternative.

**2-1052** December 2008

## Garibay, Patricia

## Page 1 of 1

PD0064 August 13, 2008 My name is Patricia Garibay. I live in Ka site be located on Plum Island where it's currently at. Kansas. I would prefer that the new 1| 24.1 I don't think it should be placed in the middle of a town like Manhattan. 2 25.4 Thank you.

Comment No: 1 Issue Code: 24.1

DHS notes the commentor's support for the Plum Island Site Alternative.

Comment No: 1 Issue Code: 25.4

DHS notes the commentor's opposition to the Manhattan Campus Site Alternative.

**2-1053** December 2008

#### Garton, Jan

#### Page 1 of 1

WD0327 From: Monday, August 18, 2008 2:27 PM NBAFProgramManager To: Subject: Draft EIS statement comments August 18, 2008 1|25.4 | I am opposed to locating the NBAF on the mainland U.S.A., and specifically in Manhattan, KS. The recent tornado here was a grim reminder of the damage that could occur in the event of a direct hit. It is not so improbable as it seemed a few months ago. It is also likely that despite the strictest protocols, human error will happen as it has happened in other biosecurity laboratories, or perhaps even deliberate human actions -- either by a single disgruntled employee or a calculated terror attack -- that could result in the release of pathogens. Your review of the possible costs of a release of foot and mouth disease in Riley County amounted to \$4.2 billion. That's the largest dollar figure of all sites, but it does not actually address the human costs in terms of loss of livelihood, the hit on various state programs due to the collapse of a major state industry, and the giant exodus of people from Manhattan and Kansas. Kansas State University will go from a robust educational institution to an empty shell. The GAO reported that DHS does not have evidence to show that foot and mouth disease research can be safely done on the mainland. The Plum Island site's cumulative impacts are NEGLIGIBLE, the only site with that evaluation. It is critical that any research using deadly pathogens be conducted in a facility that provides the safest setting, and it appears that Plum Island continues to be that location. It is time to ignore the rah-rah of people who see this as an economic development opportunity and to I remember that this is extremely dangerous research. Keep the site where it is, keep it off the mainland, and keep it out of Manhattan, KS. Jan Garton Looking for a car that's sporty, fun and fits in your budget? Read reviews on AOL Autos.

Comment No: 1 Issue Code: 25.4

DHS notes the commentor's opposition to the five mainland site alternatives.

Comment No: 2 Issue Code: 21.4

DHS notes the commenter's concern regarding potential tornado impacts to the NBAF. The NBAF would be designed and built to withstand the normal meteorological conditions that are present within the geographic area of the selected site (hurricanes, tornados, etc.). Given the nature of the facility, more stringent building codes are applied to the NBAF than are used for homes and most businesses, regardless of which NBAF site is chosen. The building would be built to withstand wind pressures up to 170% of the winds which are expected to occur locally within a period of 50 years. This means the building's structural system could resist a wind speed that is expected to occur, on the average, only once in a 500 year period. In the unlikely event that a 500-year wind storm strikes the facility, the interior BSL-3Ag and BSL-4 spaces would be expected to withstand a 200 mph wind load (commonly determined to be an F3 tornado). If the NBAF took a direct hit from an F3 tornado, the exterior walls and roofing of the building would likely fail first. This breach in the exterior skin would cause a dramatic increase in internal pressures leading to further failure of the building's interior and exterior walls. However, the loss of these architectural wall components should actually decrease the overall wind loading applied to the building, and diminish the possibility of damage to the building's primary structural system. Since the walls of the BSL-3Ag and BSL-4 spaces would be reinforced cast-in-place concrete, those inner walls would be expected to withstand the tornado.

DHS notes the commentor's concerns regarding the impact of a pathogen release on the local population, livestock industry, businesses and infrastructure resulting from human error, attack or terrorist event . The NBAF would be designed, constructed, and operated to ensure the maximum level of public safety and to fulfill all necessary requirements to protect the environment. Section 3.14 and Appendix E of the NBAF EIS, investigates the chances of a variety of accidents that could occur with the proposed NBAF and consequences of potential accidents, The chances of an accidental release are low. Although some accidents are more likely to occur than others (e.g., safety protocol not being followed), the chances of an accidental release based on human error are low in large part due to the design and implementation of biocontainment safeguards in conjunction with rigorous personnel training. For example, as described in Section 2.2.2.1 of the NBAF EIS, all laboratory staff would receive thorough pre-operational training, as well as ongoing training, in the handling of hazardous infectious agents, understanding biocontainment functions of standard and special practices for each biosafety level, and understanding biocontainment equipment and laboratory characteristics. Appendix B to the EIS describes biocontainment lapses and laboratory acquired infections. Laboratory-acquired infections have not been shown to be a threat to the community at large. As set out in Section 3.14.3.4 of the NBAF EIS, employees and contractors will be screened prior to employment or engagement and monitored while working, among other security measures. In addition, oversight of NBAF operations, as described in Section 2.2.2.6 of the NBAF EIS, will be conducted in part by the Institutional Biosafety Committee (IBC), which includes community

2-1054 December 2008

representative participation, and the APHIS Animal Research Policy and Institutional Animal Care and Use Committee. Should the NBAF Record of Decision call for the design, construction, and operations of the NBAF, site specific protocols would then be developed in coordination with local emergency response agencies and would consider the diversity and density of populations, including institutionalized populations, residing within the local area. The need for an evacuation under an accident conditions is considered to be a very low probability event. DHS would have site-specific standard operating procedures and emergency response plans in place prior to the initiation of research activities at the proposed NBAF. Section 3.14 and Appendix E of the NBAF EIS, addresses accident scenarios, including external events such as a terrorist attack. A separate Threat and Risk Assessment (designated as For Official Use Only)(TRA) was developed outside of the EIS process in accordance with the requirements stipulated in federal regulations.

DHS notes the commentor's position and concern for locating NBAF on a mainland site. DHS believes that experience shows that facilities utilizing modern biocontainment technologies and safety protocols, such as would be employed in the design, construction, and operation of NBAF, would enable NBAF to be safely operated on the mainland.

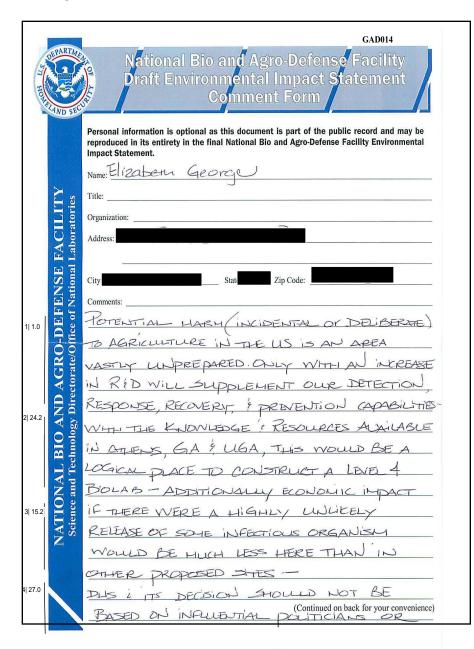
Comment No: 3 Issue Code: 5.0

DHS notes the commentor's opposition to the five mainland site alternatives.

**2-1055** December 2008

#### George, Elizabeth

#### Page 1 of 2



Comment No: 1 Issue Code: 1.0

DHS notes the commentor's statement in support of the NBAF mission.

Comment No: 2 Issue Code: 24.2

DHS notes the commentor's support for the South Milledge Avenue Site Alternative.

Comment No: 3 Issue Code: 15.2

DHS notes commentor's support for the South Milledge Avenue Site. The potential economic effects including those from an accidental release are discussed in Section 3.10.9 and Appendix D. As shown in Appendix D, the LLNL study reports the estimated economic impacts from an accidential release of FMDV at site alternatives. The total estimated costs of an outbreak at the South Milledge Avenue Site Alternative is \$3.35 billion which is the second lowest among the site alternatives, with Plum Island being the lowest. The lower economic impact at the South Milledge Avenue Site is mainly due to the smaller size of affected livestock sector in the region.

#### Comment No: 4 Issue Code: 27.0

DHS notes the commentor's support for the South Milledge Avenue Site Alternative. All comments received during the 60-day comment period, both oral and written, were given equal consideration and responded to in NBAF Final EIS. Community acceptance is only one of several factors that will affect the decision on whether or not the NBAF is built, and, if so, where. The decision will be made based on the following factors: 1) analyses from the EIS; 2) the four evaluation criteria discussed in section 2.3.1 (includes community acceptance); 3) applicable federal, state, and local laws and regulatory requirements; 4) consultation requirements among the federal, state, and local agencies, as well as federally recognized American Indian Nations; 5) policy considerations; and 6) public comment.

**2-1056** December 2008

# George, Elizabeth

Page 2 of 2

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	THANK YOU FOR YOUR COMMENTS
	Please return this form to the comment table. It may also be mailed or faxed as follows:  U.S. MAIL  TOLL-FREE FAX  U.S. Department of Homeland Security  1-866-508-NBAF (6223)
	Science and Technology Directorate James V. Johnson Mail Stop #2100
	245 Murray Lane, SW Building 410 Washington, DC 20528

#### Geraghty, Bill

## Page 1 of 1

WD0787 From: Bill Geraghty Sent: Monday, August 25, 2008 4:43 PM NBAFProgramManager Subject: Plum Island DHS DEIS re: Level 4 Research Facility Concerns have been raised in the past regarding the potential for wildlife carring pathogens from the Island to the mainland. With respect to deer, my understanding is that they were hunted on the Island in order to keep the population down and the likelihood of their swimming to the mainland low. However, my concern is with seagulls which are scavengers and in great numbers in that area. There is really no way to prevent them from traveling to and from the Island and the mainland. What is being proposed in order to reduce the risk of pathogens being carried off the Island by seagulls and other birds? IMPORTANT: This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please notify the sender and delete it from your system.

#### Comment No: 1 Issue Code: 21.1

Section 3.14 and Appendix E of the NBAF EIS evaluate the potential effects on health and safety of operating the NBAF at the six site alternatives. The evaluation concludes that a pathogen release at the Plum Island Site would be slightly less likely to result in adverse effects than the mainland sites.

DHS notes the commentor's statement about deer eradication. PIADC has procedures to control the animal population.

#### Comment No: 2 Issue Code: 21.1

DHS notes the commentor's concerns regarding a release of a pathogen at the Plum Island Site and the potential for wildlife (birds) to transport the pathogen to the mainland. The NBAF would be designed, constructed, and operated to ensure the maximum level of public safety and to fulfill all necessary requirements to protect the environment. By definition and as identified in Chapter 1, Section 1.1 of the NBAF EIS, BSL-4 facilities are specifically designed to safely handle exotic pathogens that pose a high risk of life threatening disease in animals and humans through the aerosol route and for which there is no known vaccine or therapy. The NBAF would provide state-of-the-art operating procedures and biocontainment features to minimize the potential for outside insect vector penetration, laboratory-acquired infections and accidental releases. Section 2.2.1.1 (Biosafety Design) of the NBAF EIS, provides a discussion of the biosafety fundamentals, goals and design criteria for the NBAF operation.

**2-1058**December 2008

#### Germaise, Victoria

#### Page 1 of 1

WD0024 From: Vicky Germaise Tuesday, July 01, 2008 1:32 PM Sent: NBAFProgramManager Subject: plum island Dear Sir. NY, at the far east end of Long Island, I believe that Plum Island's location is not As a resident of 1 25.1 suitable for a Biosafety Level 4 facility. Generations of citizens have spent hundreds of millions of dollars and years of their lives working to make this area's land and waters a haven for our residents and visitors. A Level 4 facility at this location is unacceptable. In addition to the potential impact on personal safety and land values, this location, an entry point to New York, would be an enticing invitation to terrorists. 3 21.1 I stand with Senator Clinton and Representative Tim Bishop in advocating an upgrade for maintaining the BSL-3 lab on Plum Island, but I am AGAINST transforming the site to a Biosafety Level 4. Respectfully, Victoria Germaise

Comment No: 1 Issue Code: 25.1

DHS notes the commentor's opposition to the Plum Island Site Alternative.

Comment No: 2 Issue Code: 1.0

DHS notes the commentor's opposition to the Plum Island Site Alternative.

Comment No: 3 Issue Code: 21.1

DHS notes the commentor's concerns regarding the risk of a potential accident or terrorist event. The NBAF would be designed, constructed, and operated to ensure the maximum level of public safety and to fulfill all necessary requirements to protect the environment. As described in Chapter 3 and summarized in Section 2.5 of the NBAF EIS, the impacts of activities during normal operations at any of the six site alternatives would likely be minor. Sections 3.8.9, 3.10.9, and 3.14 (Health and Safety), and Appendices B, D, and E of the NBAF EIS, provide a detailed analysis of the consequences from a accidental or deliberate pathogen release. Should the NBAF Record of Decision call for the design, construction, and operations of the NBAF then site specific protocols would be developed, in coordination with local emergency response agencies that would consider the diversity and density of populations residing within the local area. DHS would have site-specific standard operating procedures and response plans in place prior to the initiation of research activities at the proposed NBAF. Section 3.14 and Appendix E of the NBAF EIS, addresses accident scenarios, including external events such as a terrorist attack. A separate Threat and Risk Assessment (designated as For Official Use Only)(TRA) was developed outside of the EIS process in accordance with the requirements stipulated in federal regulations. The purpose of the TRA was to identify potential vulnerabilities and weaknesses associated with the NBAF and are used to recommend the most prudent measures to establish a reasonable level of risk for the security of operations of the NBAF and public safety. Because of the importance of the NBAF mission and the associated work with potential high-consequence biological pathogens, critical information related to the potential for adverse consequences as a result of intentional acts has been incorporated into the NEPA process. Security would be provided by a series of fencing, security cameras, and protocols. In addition, a dedicated security force would be present on-site. Additional security could be provided via cooperation with local law enforcement agencies.

2-1059 December 2008

## Gibney, Ellen

## Page 1 of 1

	WI	D0045	Cor DH
From: Sent:	Ellen Byars Tuesday, July 08, 2008 10:20 PM		
To: Subject	NBAFProgramManager  BABAD Facility Proposal for Butner, NC		
Dear Sir o	r Madam:		
25.3 I am send people in many haza research.	ing this email in protest of the building of the NBAD Facility in my home state of North Carolina. Many my community object to having the lab in our state, or anywhere for that matter. There seems to be ards associated with such a site not to mention the senseless killing of animals involved in the		
Ellen Gibn	ey		
The i'm Ta	elkaton. Can 30-days of conversation change the world? Find out now.	_	

nt No: 1 Issue Code: 25.3 tes the commentor's opposition to the Umstead Research Farm Site Alternative.

**2-1060** December 2008

#### Gibson, Derrick

#### Page 1 of 1

From: Derrick Gibson
Sent: Sunday, June 22, 2008 8:54 AM
To: NBAFProgramManager
Subject: Why Leave Plum Island?

Dear Sir or Madam:

I understand from your website the requirements for a new facility, but what I cannot understand is the rationale for moving from an isolated place - i.e., easily controlled - to one that is more integrated in with the population you seek to protect. Certainly, no one intends for a "worst-case scenario" to occur and many people will spend many months of planning to ensure that said scenario will not occur, but we all know things happen. Unforeseen events occur; that is why we have a word like "unforeseen".

Increasing risk to the American population is not acceptable and would be an egregious misuse of the authority granted to your office by the Congress - and the people - of the United States.

Sincerely, Derrick Gibson Comment No: 1 Issue Code: 5.0

DHS notes the commentor's opposition to the five mainland site alternatives.

Comment No: 2 Issue Code: 21.0

DHS notes the commentor's concerns regarding the impact of a pathogen release on the local population, livestock industry, businesses and infrastructure. The NBAF would be designed, constructed, and operated to ensure the maximum level of public safety and to fulfill all necessary requirements to protect the environment. Section 3.14 and Appendix E of the NBAF EIS, investigates the chances of a variety of accidents that could occur with the proposed NBAF and consequences of potential accidents. The chances of an accidental release are low. Although some accidents are more likely to occur than others (e.g., safety protocol not being followed), the chances of an accidental release based on human error are low in large part due to the design and implementation of biocontainment safeguards in conjunction with rigorous personnel training. For example, as described in Section 2.2.2.1 of the NBAF EIS, all laboratory staff would receive thorough preoperational training, as well as ongoing training, in the handling of hazardous infectious agents, understanding biocontainment functions of standard and special practices for each biosafety level, and understanding biocontainment equipment and laboratory characteristics. Appendix B to the EIS describes biocontainment lapses and laboratory acquired infections. Laboratory-acquired infections have not been shown to be a threat to the community at large. As set out in Section 3.14.3.4 of the NBAF EIS, employees and contractors will be screened prior to employment or engagement and monitored while working, among other security measures. In addition, oversight of NBAF operations, as described in Section 2.2.2.6 of the NBAF EIS, will be conducted in part by the Institutional Biosafety Committee (IBC), which includes community representative participation, and the APHIS Animal Research Policy and Institutional Animal Care and Use Committee. Should the NBAF Record of Decision call for the design, construction, and operations of the NBAF, site specific protocols would then be developed in coordination with local emergency response agencies and would consider the diversity and density of populations, including institutionalized populations, residing within the local area. The need for an evacuation under an accident conditions is considered to be a very low probability event. DHS would have site-specific standard operating procedures and emergency response plans in place prior to the initiation of research activities at the proposed NBAF.

Comment No: 3 Issue Code: 19.0

DHS notes the commentor's concern about the risk to health and safety from the NBAF operation. DHS believes that experience shows that facilities utilizing modern biocontainment technologies and safety protocols, such as would be employed in the design, construction, and operation of NBAF, would enable NBAF to be safely operated with a minimal degree of risk, regardless of the site chosen. The NBAF would provide state-of-the-art biocontainment features and operating procedures to minimize the potential for laboratory-acquired infections and accidental releases. The risk of an accidental release of a pathogen is extremely low. Sections 3.8.9, 3.10.9, 3.14, and Appendices B, D, and E of the NBAF EIS, provide a detailed analysis of the consequences from a accidental or

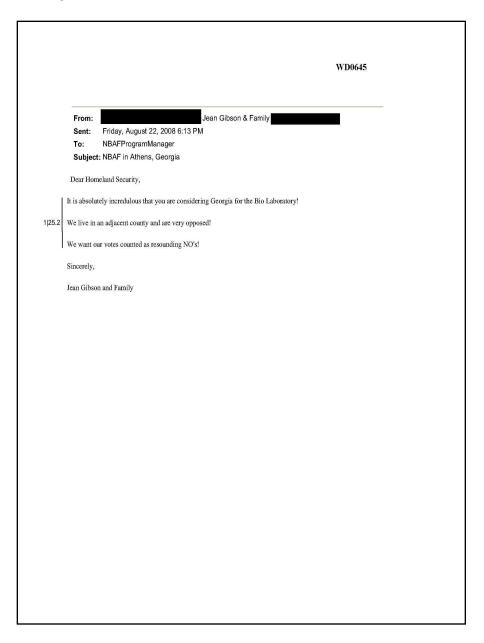
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deliberate pathogen release. Should the NBAF Record of Decision call for the design, construction, and operations of the NBAF then site specific protocols and emergency response plans would be developed, in coordination with local emergency response agencies that would consider the diversity and density of human, livestock, and wildlife populations residing within the area. DHS would have site-specific standard operating procedures and emergency response plans in place prior to the initiation of research activities at the proposed NBAF. It has been shown that modern biosafety laboratories can be safely operated in populated areas. An example is the Centers for Disease Control and Prevention in downtown Atlanta, Georgia, where such facilities employ modern biocontainment technologies and safety protocols, such as would be employed in the design, construction, and operation of NBAF.

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## Gibson and Family, Jean

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Comment No: 1 Issue Code: 25.2 DHS notes the commentor's opposition to the South Milledge Avenue Site Alternative.

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## Giffin, Donald

## Page 1 of 1

WD04	120
11304	
From: Giffin, Donald  Sent: Wednesday, August 20, 2008 4:31 PM  To: NBAFProgramManager	
NBAF belongs in Kansas on the merits due to our unique ability to protect America's food supply and agricultural economy.	d
Donald W Giffin	

Comment No: 1 Issue Code: 24.4 DHS notes the commentor's support for the Manhattan Campus Site Alternative.

**2-1064** December 2008

## Gilrees, Bill

## Page 1 of 1

	PD0331
	August 25, 2008
1  24.5	This is Bill Gilrees. I live in Mississippi, specifically, and I'm calling to voice my support of the project location in Flora, Mississippi.
	I know there's been some negative press, but I, as a taxpayer and voter, I am in favor of the facility.
	Thank you.

Comment No: 1 Issue Code: 24.5 DHS notes the commentor's support for the Flora Industrial Park Site Alternative.

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WD0009

From: Carol Goerig

Tuesday, June 24, 2008 2:11 PM Sent: NBAFProgramManager cmgoerig@hotmail.com Cc: Subject: NBAF in Athens, Ga.

Below are my comments regarding the possible location of NBAF in Athens, Ga.

I am strongly opposed to locating NBAF here in Athens, one mile from my home, for many reasons, and I want to

add my voice to the protest effort. My concerns are environmental:

- the lab's siting near our Oconee River, and the "potential for effects [that] are greater" at this site (DEIS
- our ongoing severe drought and the needless depletion of our limited water resources - air quality issues which are not resolved and will require "additional modeling...once the NBAF design and 3 9.2 location have been determined." (DEIS, p. 12)
- geology and soils: "co-ordination with the NRCS is not complete" (DEIS); clearly there are major issues requiring answers, which we were promised by DHS personnel at our most recent meeting with them in Athens. 5| 13.2 | - the Important Bird Area (IBA) at the site; the IBA is not mentioned in the DEIS, but it is an important and unique feature of the Milledge Avenue site, and it is also contiguous with the State Botanical Garden. I am not willing to believe that there will be negligible effect upon it after at least four years of highly disruptive construction. To say that the effects to the existing biological makeup of the six sites "would be similar for all sites" seems dismissive of each site's uniqueness and possible vulnerability to environmental degradation in areas that DHS has chosen to ignore.

Other concerns are related to dealing with a highly-secretive agency such as DHS, which would have absolute control over information dissemination and would be expected to withhold information which might alarm the public or cause fear or suspicion, however warranted. When I read that "DHS anticipates that the NBAF initially would focus BSL3Ag research on"..(list of diseases)..."subject to change as threats and risk assessments change" (DEIS p. 6), words like "anticipates" and "initially" make it clear to me that the list of diseases to be studied can be changed at will, and that's only in the BSL3 areas...an even worse scenario can be predicted in the BSL4 areas, and we will never know what goes on there. Anthrax? Bio-weapons? Of course I know about the 1972 treaty supposedly prohibiting the manufacture of bio-weapons, but I also know about Pentagon research into so-called "defensive use" of these weapons, a term which does not hold up under even casual scrutiny.

And we are supposed to welcome NBAF to our community? We are supposed to want this bioterror lab in our midst, for a gain of what?

Seventy jobs? Seventy jobs? The construction workers will be mostly illegal Mexicans, and they will send their wages home to Mexico; the full-timers who move into the area will go to Oconee County for their good schools (have you done your research regarding the quality of our schools here in Athens-Clarke County?), so what's in it for us, besides environmental degradation and the promise of living under the miserable cloud of doom that will hang over your facility and forever alter our quality of life. Those of us who follow these developments want you to understand that the so-called enthusiastic support for NBAF that you hear about comes only from our Governor, the University, our senators Chambliss and Isakson, and of course, our Mayor Heidi Davison, who apparently put our community into the running without consulting anyone, not even our Commission, as I understand it. Heidi wants to reduce our appalling poverty rate, so she jumped at the chance to get a big Federal pork machine established here, in the hope that it would generate jobs. I voted for her twice, but she's lost me on this one. But why should that matter...she'll be out of office in November and therefore, if we are selected, she won't be in office any more and won't have to take the abuse that will descend on the Mayor when we find ourselves having to live with the consequences, intended and unintended, of her invitation.

Comment No: 1 Issue Code: 25.2

DHS notes the commentor's opposition to the South Milledge Avenue Site Alternative.

Comment No: 2 Issue Code: 12.2

DHS notes the commentor's concern regarding the proximity of the proposed NBAF to existing water resources such as the Middle Oconee River. DHS also acknowledges the regional drought conditions. A description of the potential effects to water resources is included in the NBAF EIS Section 3.7.3. No direct effects would occur, and erosion control and stormwater control measures would reduce the potential for indirect impacts to occur. The NBAF EIS Section 3.7.3.3.1 describes the NBAF at the South Milledge Avenue Site as using approximately 118,000 gallons per day of potable water approximately 0.76% of Athens 15.5 million gallons per day usage. The NBAF's annual potable water usage is comparable to approximately 228 residential homes' annual potable water usage.

#### Comment No: 3 Issue Code: 9.2

The potential effects of NBAF operations on air quality are discussed in Section 3.4 of the NBAF EIS. Site-specific effects at the South Milledge Avenue Site are discussed in Section 3.4.3. Air emissions were estimated using SCREEN3, a U.S. EPA dispersion modeling program. Conservative assumptions were used to ensure the probable maximum effects were evaluated. Once the final design is determined, a more refined air emissions model will be used during the permitting process. The final design will ensure that the NBAF %does not significantly affect% the region's ability to meet air quality standards.

#### Comment No: 4 Issue Code: 11.2

DHS initiated all coordinations as appropriate. Additionally, when response letters were not received, follow-up was attempted.

#### Comment No: 5 Issue Code: 13.2

DHS notes the commentor's concern. A description of the IBA is included in Section 3.8.3.1.4, and the potential effects to the IBA are included in Section 3.8.3.2.4 (construction effects) and Section 3.8.3.3.3.4 (operations). Minor effects would occur with loss of 0.2 acres of forested habitat, and minimal effects would occur from operations due to increases in light and noise.

#### Comment No: 6 Issue Code: 2.0

DHS notes the commentor's lack of confidence in the DHS. DHS has made every effort to explain the operational aspects of NBAF and has conducted a thorough and open public outreach program in support of the NBAF EIS that exceeded NEPA requirements. DHS prepared the NBAF EIS in accordance with the provisions of NEPA (42 U.S.C. 4321 et seq.) and CEQ's regulations for implementing NEPA (40 CFR 1500 et seq.). There would no classifed research at the NBAF, however there may occassionally be classified FBI forensics cases. Currently, the PIADC facility publishes

1 25.2

2 12.2

4 11.2

6 2.0

713.0

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research in publicly available research journals; NBAF would publish its research in publicly available research journals as well.

DHS notes the commentor's concern that all possible pathogens to be studied at the NBAF are not listed in the NBAF EIS. The pathogens to be studied at the NBAF as provided in Chapter 2, Section 2.2.1 of the NBAF EIS include Foot and Mouth Disease virus, Classical Swine Fever virus, Vesicular Stomatitis virus, Rift Valley Fever virus, Nipah virus, Hendra virus, and African Swine Fever virus. Should the NBAF be directed to study any pathogens not included in the list of pathogens included in the NBAF EIS, DHS and USDA would conduct an evaluate of the new pathogen(s) to determine if the potential challenges and consequences were bounded by the current study. If not, a new risk assessment would be prepared and a separate NEPA evaluation may be required.

#### Comment No: 7 Issue Code: 3.0

DHS notes the commentor's concern regarding the government's intentions for the facility. The NBAF's mission is defensive and would not involve offensive bioweapons research or development. The international treaty known as the Biological and Toxin Weapons Convention, to which the United States is a signatory, prohibits the development, production, stockpiling and acquisition of such weapons. DHS's mission is to study foreign animal, zoonotic (transmitted from animals to humans) and emerging diseases that threaten our agricultural livestock and agricultural economy. NBAF will research the transmission of these animal diseases and develop diagnostic tests, vaccines, and antiviral therapies for foreign animal, zoonotic and emerging diseases. By proposing to construct the NBAF, DHS is following policy direction established by the Congress and the President.

#### Comment No: 8 Issue Code: 15.2

DHS notes the commentor's statement regarding employment. The number of short-term and permanent jobs are discussed in Section 3.10. It is expected that approximately 2,700 direct temporary jobs (2,100 for the Plum Island Site) would result from construction of the NBAF, with many of the jobs being filled locally. Between 250-350 permanent jobs would result from operation of the NBAF, with much of the scientific work force relocating to the region.

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Local opposition to NBAF is allive and well. Just go to the opposition website, <a href="https://www.athensfaq.org">www.athensfaq.org</a> , and take a look at the blog entities following the Athens Banner Heradi's June 21 article entitled "Risk from bloab mil, fed claim". Our paper has failed us miserably in its refusal to commit to an investigative report of the NBAF, choosing instead to be the spineless mouthpiece of the university, the Mayor, and all the above-named NBAF boosters.  If local support and lack of opposition are indeed important criteria (and you say they are)as you decide on the NBAF site, then you will never decide on Athens, Ga.  Sincerely,  Carol Goerig  The other season of giving begins 6/24/08. Check out the i'm Talkathon. Check it out!		

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## Page 1 of 1

WD0110 From: Carol Goerig Sunday, July 27, 2008 11:43 AM nbaf manager Subject: NBAF and our schools in Athens Dear Program Manager, There will be unpleasant surprises in store for families who move themselves and their children to Athens without having researched our schools. I refer to an article in the Athens Banner-Herald of Saturday, july 26, 2008: "Math failures kill progress" was the headline that day, and our Interim Superintendent James Simms characterized our showing as "ugly". On Page A6 we learn that "only three of the 19 schools in the Clarke County School District made AYP ("adequate yearly progress"). These families might also want to know that alternatives to public education are expensive: Athens Academy tuition runs from about \$10,000 a year in kindergarten to about \$14,000 a year for high school. Home school, anyone? Carol Goerig Keep your kids safer online with Windows Live Family Safety. Help protect your kids.

Comment No: 1 Issue Code: 15.2

DHS notes the commentor's concern. As described in Section 3.10, the NBAF would not have an adverse effect on the public school systems at any of the site alternatives. The cost of enrolling children in private schools was not included in the evaluation and is not within the scope of NBAF

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WD0377 From: Carol Goerig Sent: Tuesday, August 19, 2008 6:00 PM nbaf manager Subject: Stay Away 1|25.2 | I attended both NBAF meetings in Athens last week and remain totally opposed to building NBAF in our It should have been clear to you that those in favor of bringing NBAF to town all stand to gain something from what they think the lab will bring to our community...they have little to say except "Come to Athens! We need your jobs! We're poor!" It doesn't matter to these folks what kind of business comes courting...they're all good! Wal-Mart, bomb factory, germ lab..."We don't care! We're desperate!" Kinda like the desperate characters that cling to one in the halls of high school. We don't trust them, either, and you shouldn't trust us. Our schools are poor, our crime rate is high, we can't even afford to keep our street lights lit, and Atlanta's CDC is a miserable 90-minute commute through some of the most congested neighborhoods you have ever had to fight your way through. Listen to the WSB traffic reports sometimes. Does Dr. Lee tell you all these things? 2|12.2| And, oh yes, the drought is really bad. We don't have enough water for ourselves, let alone you and your resource-gobbling mega facility. We note that projected costs for this thing have gone up 150 percent in the past month, and that's two years before you say you will break ground. Our local rag tells us that supporters outnumbered protesters at Thursday's evening meeting. I counted 21 speakers "for" and 25 "against". Pretty close, I'll admit, but there is a silent majority out there afraid to speak out and possibly lose their jobs. Athens does not want to become a Government Town. 1 cont.|| Finally, as Grady Thrasher cautioned, "Do not mistake our politeness for passivity or lack of resolve." That's just the way our Mamas taught us, and it doesn't mean a thing. 25.2 | That's just the way our realists taggit ac, and the way our realist the door hit you on your way out." Carol Goerig Be the filmmaker you always wanted to be-learn how to burn a DVD with Windows®. Make your smash

Comment No: 1 Issue Code: 25.2

DHS notes the commentor's opposition to the South Milledge Avenue Site Alternative.

Comment No: 2 Issue Code: 12.2

DHS notes the commentor's drought concerns and DHS acknowledges current regional drought conditions. As described in Section 3.7.3.3.1 of the NBAF EIS, the South Milledge Avenue Site alternative would use approximately 118,000 gallons per day of potable water, an amount that is approximately 0.76% of Athens' current annual average of 15.5 million gallons per day usage. The NBAF annual potable water usage is expected to be approximately equivalent to the amount consumed by 228 residential homes.

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#### Goh, Peng

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PD0361

August 25, 2008

Hi.

1|25.2 | I'm Peng Goh and I live in Georgia and I'm against having the bio lab here in town. I would definitely prefer it to be somewhere where there is less population of students and retarded people, and Athens is suppose to be a top-10 retirement town, and safe and all that, and I don't think a bio lab here is going to be very attractive.

I would even move away. I've been here 16 years and there's a great international population here as well. So, I would be against having the bio lab here in town.

Thank you for your time and hopefully we won't have to deal with this and there's 4|5.0 definitely, I'm sure, other locations that are more desirable and less populated where testing can be carried out.

Thanks.

Bye.

Comment No: 1 Issue Code: 25.2

DHS notes the commentor's opposition to the South Milledge Avenue Site Alternative.

Comment No: 2 Issue Code: 5.0

DHS notes the commentor's concerns. As described in Section 2.3.1 of the NBAF EIS, DHS's site selection criteria included, but were not limited to, such factors as proximity to research capabilities and workforce. As such, some but not all of the sites selected for analysis as reasonable alternatives in the NBAF EIS are located in suburban or semi-urban areas. Nevertheless, it has been shown that modern biosafety laboratories can be safely operated in populated areas. An example is the Centers for Disease Control and Prevention in downtown Atlanta, Georgia, where such facilities employ modern biocontainment technologies and safety protocols, such as would be employed in the design, construction, and operation of NBAF.

Comment No: 3 Issue Code: 15.2

DHS notes the commentor's concern. Adverse effects to quality of life resources would not be expected with any of the site alternatives and are discussed in Section 3.10.

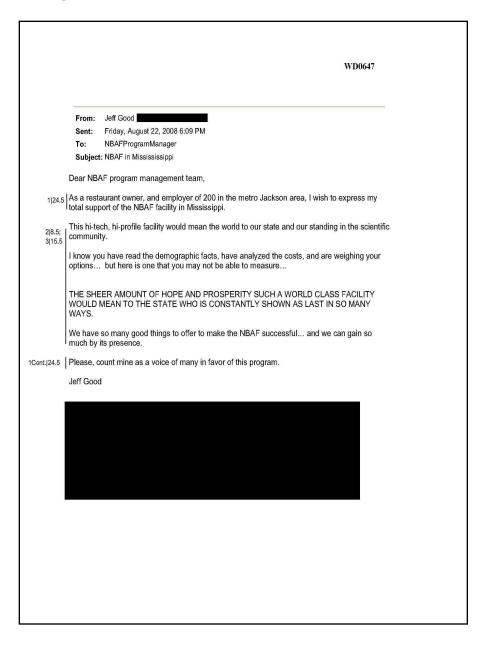
Comment No: 4 Issue Code: 5.0

As described in Section 2.3.1 of the NBAF EIS, DHS's site selection criteria included, but were not limited to, such factors as proximity to research capabilities and workforce. As such, some but not all of the sites selected for analysis as reasonable alternatives in the NBAF EIS are located in suburban or semi-urban areas. Nevertheless, it has been shown that modern biosafety laboratories can be safely operated in populated areas. An example is the Centers for Disease Control and Prevention in downtown Atlanta, Georgia, where such facilities employ modern biocontainment technologies and safety protocols, such as would be employed in the design, construction, and operation of the NBAF.

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## Good, Jeff

## Page 1 of 1



Comment No: 1 Issue Code: 24.5

DHS notes the commentor's support for the Flora Industrial Park Site Alternative.

Comment No: 2 Issue Code: 8.5

DHS notes the commentor's support for the Flora Industrial Park Site Alternative.

Comment No: 3 Issue Code: 15.5

DHS notes the commentor's support for the Flora Industrial Park Site Alternative. The economic effects of the NBAF at the Flora Industrial Park Site Alternative are included in Section 3.10.5 of the NBAF EIS.

**2-1072** December 2008